

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>B.B., A MINOR, et al.</b>	§	
	§	
	§	
<i>Plaintiffs</i>	§	
	§	
	§	
<b>v.</b>	§	<b>CASE NO. 5:18-cv-1332</b>
	§	
<b>OFFICER J. PEREZ, et al.</b>	§	
	§	
	§	
<i>Defendants</i>	§	
	§	

**NOTICE OF APPEAL OF DEFENDANTS JAMES HANCOCK, JACOB RODRIGUEZ  
AND BRYAN SMITH**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE JASON PULLIAM:

Pursuant to Federal Rule of Appellate Procedure 3(a), Defendants James Hancock, Jacob Rodriguez, and Bryan Smith (“Defendants”) hereby give notice of their intent to appeal to the United States Court of Appeals for the Fifth Circuit from the Order of the United States District for the Western District of Texas, San Antonio Division, denying Defendants’ Motion for Summary Judgment as to Defendants’ entitlement to qualified immunity as a defense against Plaintiffs’ 42 U.S.C. Section 1983 claims for unconstitutional search and seizure and excessive force (“Order”). The Order was entered in this case on June 11, 2021 (Docket No. 157). Defendants’ notice is being filed within thirty (30) days after the date that this Court entered the Order, and accordingly it is timely. Fed. R. App. P. 4(a)(1)(A).

The parties to the Order appealed from, and the names and addresses of their respective attorneys are as follows:

***Attorneys for Plaintiffs, Raymond Basco and Lucil Basco, on her own behalf and as Next Friend of B.B., a Minor:***

Solomon M. Radner  
Johnson Law, PLC  
535 Griswold St., Suite 2632  
Detroit, MI 48226  
(313) 324-8300  
Fax: (313) 324-8301  
Email: sradner@venjohnsonlaw.com

Brandon J. Grable  
Grable Grimshaw Mora PLLC  
1603 Babcock Rd Ste 280  
San Antonio, TX 78229  
2109635297  
Fax: 2109635291  
Email: brandon@ggm.law

Keith Altman  
Excolo Law, PLLC  
26700 Lahser Road Suite 401  
Southfield, MI 48033  
866-939-2656  
Fax: 248-436-6858  
Email: kaltman@excololaw.com

Madeline M. Sinkovich  
Johnson Law, PLC  
535 Griswold Street  
Suite 2632  
Detroit, MI 48226  
(248) 324-8300  
Fax: (313) 324-8301  
Email: msinkovich@venjohnsonlaw.com

***Attorney for Defendants James Hancock, Jacob Rodriguez, and Bryan Smith:***

Robert W. Piatt III  
Assistant District Attorney – Civil Division  
101 W. Nueva, 7<sup>th</sup> Floor  
San Antonio, Texas 78205  
(210) 335-0785 – Telephone  
(210) 335-2773 – Fax  
robert.piatt@bexar.org

Respectfully submitted,

JOE D. GONZALES  
Bexar County Criminal District Attorney  
By: /s/ Robert W. Piatt III  
ROBERT W. PIATT III  
SBN: 24041692  
Asst. District Attorney – Civil Division  
101 W. Nueva, 7<sup>th</sup> Floor  
San Antonio, Texas 78205  
(210) 335-0785 – Telephone  
(210) 335-2773 – Fax  
[robert.piatt@bexar.org](mailto:robert.piatt@bexar.org)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 9<sup>th</sup> day of July 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following attorneys of record:

Solomon M. Radner  
Madeline M. Sinkovich  
Johnson Law, PLC  
535 Griswold St., Suite 2632  
Detroit, MI 48226  
(313) 324-8300  
Fax: (313) 324-8301  
Email: [sradner@venjohnsonlaw.com](mailto:sradner@venjohnsonlaw.com)  
Email: [msinkovich@venjohnsonlaw.com](mailto:msinkovich@venjohnsonlaw.com)

Brandon J. Grable  
Grable Grimshaw Mora PLLC  
1603 Babcock Rd Ste 280  
San Antonio, TX 78229  
2109635297  
Fax: 2109635291  
Email: [brandon@ggm.law](mailto:brandon@ggm.law)

Keith Altman  
Excolo Law, PLLC  
26700 Lahser Road, Suite 401  
Southfield, MI 48033  
866-939-2656  
Email: [kaltman@excololaw.com](mailto:kaltman@excololaw.com)  
Fax: 248-436-6858

/s/ Robert W. Piatt III  
ROBERT W. PIATT III